



The State of New Hampshire  
**Department of Environmental Services**



Michael P. Nolin  
Commissioner

September 29, 2006

**LETTER OF DEFICIENCY #WSEB 06-148**  
Certified Mail #7005 1160 0004 7468 8089

Gerard Desrochers  
Hill Water Works  
PO Box 251  
Hill, NH 03243-0251

Subject: Hill - Public Water System: Hill Water Works (EPA #1131010)

Dear Mr. Desrochers:

The records of the NH Department of Environmental Services ("DES") show that Hill Water Works ("HWW") is classified as a public water system ("PWS"), as defined by RSA 485:1-a. A PWS is defined as any water system supplying 15 or more services, or 25 or more people for 60 or more days per year. As such, the water system owner is required to comply with NH Administrative Rule Env-Ws 300, *New Hampshire Drinking Water Rules*.

**Lead and Copper Exceedances**

Env-Ws 381 requires community water systems to monitor for lead and copper and to undertake prescribed actions if the action level is exceeded for either contaminant. DES records indicate that HWW has exceeded the action level for lead in 1999, 2001, 2004, 2005, and 2006, and the action level for copper in 1999, 2001, 2003, 2004, 2005, and 2006. In response to each of these exceedances, DES sent HWW a letter requesting, among other things, that the system submit periodic water quality ("WQ") sample results for pH and alkalinity to DES. The referenced letters specifically requested the HWW to collect WQ samples every two weeks at the point of entry to the distribution system (after treatment), and to collect WQ samples at least once per quarter from one site in the distribution system. Pursuant to Env-Ws 381.33, the results of WQ sampling were required to be sent to DES within 10 days following the end of each calendar quarter. **To date, DES has not received the results of any WQ samples.**

This Letter of Deficiency ("LOD") shall serve as a formal Notice of Violation for the failure to submit the results of WQ sampling for the first and second quarters of 2006. Pursuant to Env-Ws 351, public notice of this violation must be provided to consumers as soon as possible, but no later than 30 days after the water system learns of the violations.

DES believes the WQ monitoring violations can be corrected and future violations prevented by taking the following actions:

1. **Upon receipt of this letter**, begin collecting WQ samples (consisting of pH and alkalinity):
  - a.) at least once every two weeks at the entry point to the distribution system (after treatment); and
  - b.) at least once per calendar quarter at one site in the distribution system; and
2. **By October 31, 2006**, provide proof of public notice of the failure to submit WQ sample results to DES for the first and second quarters of 2006, in accordance with the enclosed public notice template; and
3. **By January 10, 2007**, submit to DES, on the enclosed Water Quality Report form, the WQ sample results for the fourth quarter of 2006.

WQ sample results must be sent to DES within 10 days following the end of each calendar quarter for as long as the system exceeds the action level of lead or copper. Please be advised that DES will review the reported WQ results to determine whether the current treatment for lead and copper is optimized. If HWW continues to exceed the lead and copper action levels, DES may require further actions.

**All information as requested above should be addressed as follows  
or faxed to (603) 271-5171:**

Leah McKenna  
Department of Environmental Services  
Water Supply Engineering Bureau  
29 Hazen Drive, PO Box 95  
Concord, NH 03302-0095

### **Chemical Monitoring Violations**

The HWW is required to submit chemical samples according to the system's established Master Sampling Schedule to the State laboratory or a State-certified laboratory in compliance with NH Administrative Rule Env-Ws 327. DES records show that the subject water system failed to submit the following chemical sample results for the following monitoring period for Source 002: GRW 2/ Murray Hill Supply:

### **Quarter 1 2006 – Volatile Organic Compounds (VOCs)**

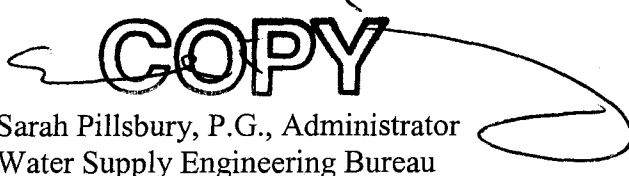
As a result of the failure to submit the above-described sample, a Notice of Violation ("NOV"), dated June 16, 2006 was sent to you. The NOV requested that you immediately submit the above-described sample as a make-up sample. To date, DES has not received the make-up sample result, thus placing the water system in violation of Env-Ws 327. In response, DES has adjusted HWW's master sampling schedule to require this missing VOC sample be taken during

the first quarter of 2007 in order to ensure 4 consecutive quarters of initial round VOC samples are collected. A copy of the master sampling schedule is enclosed.

In the event compliance is not achieved within these time periods, DES may initiate formal action against HWW, including issuing an order requiring the deficiencies to be corrected, initiating an administrative fine proceeding, and/or referring the matter to the NH Department of Justice for imposition of appropriate penalties.

If you have any questions regarding this letter, please contact Leah McKenna at (603) 271-0655 or by email at [lmckenna@des.state.nh.us](mailto:lmckenna@des.state.nh.us) for the missed VOC sample, and Becky Presby at (603) 271-2516 or by email at [rpresby@des.state.nh.us](mailto:rpresby@des.state.nh.us) for the Lead and Copper issues.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'COPY' with a large loop at the end.

Sarah Pillsbury, P.G., Administrator  
Water Supply Engineering Bureau

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Enclosures: Master Sampling Schedule  
Public Notice template (Pb/Cu MR)  
Water Quality Report

cc w/ enclosure(s): John Benham, Primary Contact

cc: Gretchen R. Hamel, DES Legal Unit Administrator  
Jeanne Galloway, Town of Hill Health Officer  
EPA, Region 1  
File